IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)
NATIONAL FORGE COMPANY, et, al.)
Debtor.)
OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF NATIONAL FORGE COMPANY,)))
Plaintiff)
And)
OFFICIAL COMMITTEE OF RETIREES OF NATIONAL FORGE COMPANY,)))
Intervenors)
v.) C.A. No. 04-21 ERIE)
E. ROGER CLARK, et al.)
Defendants)

EXPEDITED SCHEDULING MOTION CERTIFICATE

Pursuant to Local Rule 16.1.2(E), the Plaintiff attempted to confer with Defendants' counsel to seek their agreement to the requested modification. Counsel for the majority of the Defendants, Daniel Antos, William D. Bailey, Richard A. Brewster, Larry Campbell, James E. Caldwell, James C. Confer, Richard D'Allesandro, Donald Fissel, James B. Harris, Carl J. Luppino, Clarence E. Mason, Harold Murphy, Phillip R. Novosel, Charles R. Olson, James D. Ruhlman, Phillip R. Simons, Glenn E. Turk, Ronald L. Young, Barry Zischkau (the "Antos Defendants") consented to the proposed modification. Attached hereto as Exhibit A is a copy of the Antos Defendants consent. Counsel for the Defendants E. Roger Clark, Maurice J.

Cashman, Dana Beyeler and Robert A. Kaemmerer disagreed. Counsel for Defendants J.P. Morgan Chase & Co., Fleet Business Credit Corporation and National City Bank of Pennsylvania could not be reached before the filing of the Motion and as such, their position is unknown.

Respectfully submitted,

/S/ John M. Steiner

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Lawrence C. Bolla, Esq. PA ID No. 19679 Arthur D. Martinucci, Esq. PA ID No. 63699 2222 West Grandview Blvd. Erie, PA 16506 (814) 833-2222 Counsel for Intervenor